

What will a typical NESHAP inspection involve?

*This fact sheet provides examples of what an IDEM inspector may look for related to the Wood Furniture Manufacturing NESHAP during an inspection. These are only examples. This fact sheet does not limit what an IDEM inspector may request during an inspection. You may be asked to provide information beyond what is covered in this fact sheet. This fact sheet only contains information pertaining to 40 CFR part 63, Subpart JJ. The IDEM inspector will review rules other than Subpart JJ during the inspection.

1. A typical inspection will not be scheduled with you beforehand, it will be a surprise inspection. The inspector will sit down with you to review all the required NESHAP record keeping. The inspector will ask for the following records. They must be available on-site.
 - A. The inspector will want to see proof of how you are complying with the NESHAP. Depending on the option you choose, you will need to provide the following documents.
 - ☐ Compliant Coatings
 - Certified product data sheets for each coating and thinner subject to the emission limits and
 - The VHAP content, in lb VHAP/lb solids, as applied, for each coating subject to the emission limits. (This should be listed on your CPDS)
 - ☐ Compliant Contact Adhesives
 - Certified Product data sheets for each contact adhesive subject to the emissions limits
 - If adhesives are thinned, data sheets showing contact adhesive and thinner usage and calculation of the as-applied VHAP content; and
 - Records documenting the process in which the contact adhesive was used.
 - ☐ Compliant coatings with continuous coaters
 - Option 1
 - Certified product data sheets (you must have these on site) for each coating and thinner subject to the emission limits and
 - The VHAP content, in lb VHAP/lb solids, as applied, for each coating subject to the emission limits
 - Records must demonstrate the VHAP content does not exceed the applicable emission limit
 - Option 2
 - Certified product data sheets for each coating and thinner
 - Record of all solvent and coating additions to the reservoir; and
 - All viscosity measurements

- ☐ Averaging
 - Certified product data sheets for each coating and thinner;
 - Records of the amount of coating and thinner used each month;
 - Copies of the averaging calculations
- ☐ Add-on Control Device
 - Certified product data sheets for each coating
 - Copies of the calculations demonstrating equivalency of using a control system
 - Records of the daily average value of each continuously monitored parameter; and
 - For facilities using a fluidized bed catalytic incinerator, records of the pressure drop across the catalyst bed.
- ☐ Compliant Coatings and Control Device OR Averaging and Control Device
 - Maintain all records required by each individual option above.

B. The inspector will review your Work Practice Implementation Plan (even if you are using the plan from CMTI, you must revise it to make it specific to your source)

- ☐ Operator Training Program
 - The inspector will want to review exactly what you are using to teach employees (training materials including videos, computer programs, and overheads)-Does it contain all necessary info?
 1. A list of current personnel by name, job title, and job description required to be trained;
 2. An outline of the subjects to be covered in initial and annual refresher training for each job description;
 3. Lesson plans for training courses including the initial and annual refresher training programs. Be sure to include:
 - ✓ appropriate application techniques,
 - ✓ appropriate cleaning and washoff procedures,
 - ✓ appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and
 - ✓ appropriate management of cleanup wastes
 - The inspector will also ask for a written description of how you will document personnel's successful completion of the program. You must also show records documenting

- successful completion of the training program for each individual (this could include completed exams)
 - You will also need to provide records of the date each individual was trained.
 - How do you train new hires?
 - Who will train new hires?
 - When you begin the plant inspection, the inspector will be looking at operator spray techniques to see if your training program was successful.
- ☐ Leak Detection and Maintenance Plan should include:
 - Where will leak detection be implemented? (guns, piping, drums, all equipment used to transfer or apply finishing materials or HAP containing organic solvents)
 - Who will perform the monthly visual leak detection inspection?
 - The inspector will want to see all paperwork associated with your leak detection and maintenance plan (copies of checklists documenting visual monthly inspections of equipment, dates the inspections were conducted, whether or not a leak was found, when it was repaired, what repair was required etc.)
 - The documentation you provide should prove that all leaks have at least had an attempted repair (tightening) within 5 days and a final repair within 15 days. (If the repair requires replacement of equipment, you are allowed 3 months to complete repairs.)
- ☐ Cleaning and Washoff Solvent Accounting System

Records should include:

 - What solvent do you use for washoff and cleaning? (Does it contain HAP?)
 - How much solvent do you use for cleaning and washoff each month?
 - Record the number of pieces washed off and the reason why; and
 - Record the quantity of spent solvent generated each month by operation and whether it is recycled onsite or disposed offsite.
 - You must maintain MSDS for all solvents used for cleaning and/or washoff. This is to prove that you are not using any of the chemicals that are prohibited by the NESHA.
- ☐ Strippable Spray Booth Coating
 - Inspector will review the CPDS
 - The cleaning compounds must be less than 8% VOC by weight (unless you are cleaning conveyors, continuous

- coaters, or metal filters)
 - The solvent used for cleaning spray booths to prepare them for coating/protection must be less than 1.0 gallon per booth.
 - ☐ Application Equipment Requirements
 - Will you be using any conventional spray guns? If yes, then you will need to supply records that document conventional air spray guns are only being used as allowed.
 - The inspector will want to see the area where conventional air guns are being used.
 - ☐ Review of your Formulation Assessment plan.
 - You must maintain MSDS for coatings containing VHAP of potential concern; and
 - You must maintain annual usage records for coatings containing VHAP of potential concern.
 - Your plan must include how you established a baseline level for each VHAP of potential concern
 - You must report all exceedences of the baseline levels
2. Inspector will walk through the facility
- ☐ Inspector will be looking for open containers. All containers should be closed. This includes all finishing, cleaning, adhesive, or washoff materials. If the inspector points out a container that is open, close it immediately in his presence.
 - ☐ Washoff tanks must be covered when not in use.
 - ☐ The containers that contain the solvent used to clean guns and gun lines must be closed.
 - ☐ Containers associated with cleaning are covered when not in use.
 - ☐ Review of gun cleaning areas.
 - ☐ Inspector will be watching your sprayers and possibly talking to your employees for proper technique such as distance from part, perpendicular spray, triggering at the end of the part, etc.
 - ☐ Inspector will look at the washoff operations to be sure you minimize dripping by tilting and/or rotating the part to drain as much solvent as possible.
 - ☐ Inspector will also look for specific drying time of parts in the washoff operation.
 - ☐ Inspector will look at/listen to/test gun tip pressures and fan size.
 - ☐ Inspector will check spray guns to be sure they are not conventional.
 - ☐ Inspector will look at condition of guns and lines for paint buildup and leaks.
 - ☐ Inspector will use evidence of excessive overspray to determine proper spray techniques.